

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

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:
UTICA MUTUAL INSURANCE COMPANY, :
:
Plaintiff, :
:
v. : No. 6:09-CV-0853 (DNH/GHL)
:
FIREMAN'S FUND INSURANCE COMPANY, :
:
Defendant. :
:
----- X

**PLAINTIFF UTICA MUTUAL INSURANCE COMPANY'S
MOTION TO ALLOW LIMITED DISCLOSURE
OF CERTAIN SUBMISSIONS FILED UNDER SEAL**

As set forth in Plaintiff Utica Mutual Insurance Company's Memorandum of Law, Utica moves this Court to allow limited disclosure of certain submissions filed under seal pursuant to the Stipulated Protective Order Regarding Confidential Items and Information, Doc. No. 82.

Pursuant to the Stipulated Protective Order Regarding Confidential Items and Information, signed by Magistrate Judge George H. Lowe on July 22, 2011, Utica's Memorandum of Law and proposed order are filed under seal.

On November 22, 2011, a court conference with Magistrate Judge Lowe was held regarding the issues presented in the Motion.

Utica requests oral argument.

Pursuant to Local Rule 7.1, the return date for the Motion is January 5, 2012.

Dated: Fairfax, Virginia
November 28, 2011

HUNTON & WILLIAMS LLP

BY: /s/ Walter J. Andrews
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DECLARATION OF SERVICE

Bradford C. Mulder, hereby declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that:

I am the Managing Clerk at the law firm of Hunton & Williams LLP, attorneys for Plaintiff Utica Insurance Company.

That on November 28, 2011, I served a true copy of the attached on counsel of record, at the addresses listed below, via First-Class Mail, by depositing the same in a duly-enclosed and sealed wrapper, with the correct postage thereon, in an official letter box duly maintained by the Government of the United States of America, within the State of New York.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 28, 2011.

/s/Bradford C. Mulder
Bradford C. Mulder

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